



U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 2

December 17, 2018

BY ELECTRONIC MAIL

Robert Law, Ph.D.
de maximis, inc.
186 Center Street, Suite 290
Clinton, New Jersey 08809

Re: Re: Lower Passaic River Study Area Draft Remedial Investigation Report –
Administrative Settlement Agreement and Order on Consent for Remedial
Investigation/Feasibility Study (Agreement) CERCLA Docket No. 02-2007-2009

Dear Dr. Law:

The U.S. Environmental Protection Agency (EPA) reviewed the Cooperating Parties Group's (CPG) *draft Remedial Investigation (RI) Report Section 7*, prepared by Anchor QEA in January 2018 and provided comments on July 30, 2018. The *revised Section 7* was received from the CPG on October 01, 2018 and the CPG's responses to EPA's comments were received on October 04, 2018. EPA has reviewed the *revised Section 7* and has six remaining comment evaluations. Partner agency comments are incorporated. In accordance with Section X, Paragraph 44(d) of the Agreement, EPA has enclosed an evaluation of CPG's revised RI Report Section 7 with this letter.

Please proceed with revisions to the draft RI Report consistent with the enclosed comment evaluations. If there are any questions or clarifications needed on EPA's enclosed comment evaluations, please contact me to discuss.

Sincerely,

A handwritten signature in black ink, appearing to read "Diane Salkie".

Diane Salkie, Remedial Project Manager
Lower Passaic River Study Area RI/FS
Enclosure

Cc: Zizila, F. (EPA)
Sivak, M. (EPA)
Hyatt, B. (CPG)
Potter, W. (CPG)

EPA COMMENTS – DECEMBER 2018

LPRSA RI/FS, Remedial Investigation Report, Revised Draft Section 7, dated October 2018

No.	Section	General or Specific	Page No.	Comment
1	N/A	General	N/A	Fix footnote callouts to ensure proper sequential ordering.
2	Section 7.1, seventh paragraph	Specific	4-5	In response to prior comment #37, language in Section 7.1 was updated to describe the selection of primary and secondary COPCs for CFT model calibration. In the sentence beginning “This suite of COPCs was selected for several reasons, ...”, add that colocation or the ability to correlate un-modeled chemicals to modeled chemicals was also a consideration in the selection of COPCs to be modeled.
3	Section 7.1, seventh paragraph, including footnote 9	Specific	4-5	Prior comment #37 indicated that Section 7.1 should be revised to document how total risk will be calculated using the subset of COPCs modeled (i.e., accounting for risk associated with contaminants that were not modeled), and further indicated that an alternative approach would be to combine the series of memos related to the selection of COPCs and how totals will be calculated from them into a document, which would be reviewed, approved, and cited in the RI. While the response to this comment indicated that details of the correlations between modeled and un-modeled constituents will be provided in a separate document at a later date, the revised language in this paragraph, including footnote 9, is unclear and inconsistent. The final sentence in this paragraph implies that the RI will be updated to include finalized COPC correlations, when footnote 9 indicates the final correlations will be documented in a separate document. Revise the final sentence in this paragraph to read “... and the updated correlations and analyses will be documented in a separate document that is reviewed by USEPA once finalized” instead of “... and will be included once finalized”. Add the following to the end of footnote 9: “Details of the final regression analysis, including the underlying selection of modeled COPCs, will be included in the FS, and the separate document containing the analysis will be referenced in the FS.”
4	Section 7.1, last paragraph	Specific	6	The first sentence in this paragraph was modified to create two sentences. Correct the transition between these two sentences, as the revised language currently yields a fragment in the first sentence.

EPA COMMENTS – DECEMBER 2018

LPRSA RI/FS, Remedial Investigation Report, Revised Draft Section 7, dated October 2018

No.	Section	General or Specific	Page No.	Comment
5	Section 7.2.3.2, first paragraph	Specific	13	<p>Language in Section 7.2.3.2 was revised in response to prior comments #47 and #48. This passage from the first paragraph of Section 7.2.3.2 should include the word “simulated” where appropriate to distinguish model results from measured data (also note the editorial change reflected below):</p> <p>“Hurricane Irene induced erosion in portions of the LPR and was increased the mean surface concentrations both above and below RM 8. For 2,3,7,8-TCDD, the RM 0 to RM 8 mean surface concentration increased to 89% of its WY1996 initial condition, whereas the RM 8 to RM 14.7 mean increased to 12% above its WY1996 initial condition.”</p> <p>In addition, the final sentence of the first paragraph in Section 7.2.3.2 is new; in this sentence, replace “differ somewhat from” with “somewhat overstate” to better reflect the relative difference.</p>
6	Figures 7-4, 6, 8, 12, 14, and 16	Specific	N/A	<p>These figures were updated to present mass per time units in response to prior comment #50. It is not clear why different units are used for calibration period solids on Figures 7-2a-c and the flow period solids on Figures 7-{4, 6, 8}a-c (Figures 7-2a-c are in kt/yr while Figures 7-4a-c, 7-6a-c, and 7-8a-c are in MT/day). The same applies to the annual and flow period figures for 2,3,7,8 TCDD and Tetra-PCB. Figure 7-10a is in g/yr while Figures 7-12a, 7-14a, and 7-16a are in mg/day; Figure 7-10b is in kg/yr while Figures 7-12b, 7-14b, and 7-16b are in g/day. For each variable (solids, 2,3,7,8-TCDD, and tetra-CB), use a consistent mass per time unit.</p>

N/A – Not applicable